

Thomas Houlahan,  
Defendant, *pro se*.  
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DISTRICT OF UTAH  
BY: [Signature]  
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**IN THE UNITED STATES DISTRICT COURT IN AND FOR  
THE DISTRICT OF UTAH**

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World Wide Association of  
Specialty Programs and  
Schools,

Plaintiff,

vs

Thomas G. Houlahan,  
Defendant.

**Defendant's Memorandum in  
Support of Motion to Dispense with  
Oral Argument**

Civil No. 2:04CV00107

Judge Dale A. Kimball

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This motion is brought in accordance with DUCivR 7-1(f). Defendant asks that the Court dispense with oral argument in the matters pertaining to the Defendant's Motion to Dismiss for Lack of Personal Jurisdiction and Improper Venue.

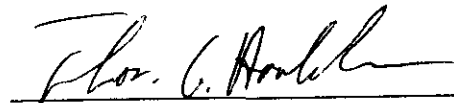
1. As indicated by the authorities cited in support of his Motion to Dismiss, Plaintiff bears the burden of pleading and production on the issue before the Court.

2. Plaintiff has neither submitted affidavits nor presented other evidentiary material, therefore the issue before the Court is a question of law based on the pleadings and Defendant's affidavits. These issues have been fully briefed by both parties.

3. The Defendant is a natural person with a very modest income who lives and works in Washington, DC. A round-trip to Salt Lake City is 3,700 miles and will take two days of travel time at substantial expense.

4. WHEREFORE, the Defendant respectfully requests that this Honorable Court will rule upon the Defendant's Motion to Dismiss for Lack of Personal Jurisdiction and Improper Venue in accordance with DUCivR 7-1(f), without requiring oral arguments.

Respectfully submitted by



Thomas Houlahan,  
Defendant, *Pro se*.

Certificate of Service:

I certify that I have served  
This Memorandum  
on Plaintiff's Counsel this 12<sup>th</sup> day of June, 2004  
by First Class U.S. Mail, postage prepaid,  
Addressed to:  
Silvester & Conroy, L.C.  
230 South 500 East, Suite 590  
Salt Lake City, Utah 84102



Thomas Houlahan  
Defendant, *Pro se*.